

1 Nicholas P. Roxborough, Esq. (SBN 113540)
npr@rpnalaw.com

2 Burton E. Falk, Esq. (SBN 100644)
bef@rpnalaw.com

3 Charles R. Rondeau (SBN 164136)
crr@rpnalaw.com

4 ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP
5820 Canoga Ave., Ste. 250
5 Woodland Hills, CA91367
Tel: (818) 992-9999
6 Fax: (818) 992-9991

7 Attorneys for Defendant
8 RECOLOGY, INC., f/k/a
NORCAL WASTE SYSTEMS, INC.

9
10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12
13 CONTINENTAL CASUALTY
14 COMPANY, an Illinois corporation,

15 Plaintiff,

16 vs.

17 RECOLOGY, INC., f/k/a NORCAL
18 WASTE SYSTEMS, INC., a California
corporation,

19 Defendants.

CASE NO. 3:15-cv-03969-SI

Complaint filed on August 31, 2015

**STIPULATION TO CONTINUE
CASE MANAGEMENT
CONFERENCE PURSUANT TO
CIVIL LOCAL RULES 16-2(e)
AND 7-12; [PROPOSED] ORDER
THEREON**

CURRENT

Hearing Date: December 4, 2015

Time: 2:30 p.m.

Courtroom: 10

NEW

Hearing Date: December 18, 2015

Time: 2:30 p.m.

Courtroom: 10

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1 TO THE COURT, ALL INTERESTED PARTIES AND THEIR COUNSEL
2 OF RECORD:

3 WHEREAS, the original Case Management Conference (“CMC”) was set by
4 the Court for Friday, December 4, 2015 at 2:30 p.m.;

5 WHEREAS, Defendant Recology, Inc., f/k/a Norcal Waste Systems, Inc.’s
6 (“Defendant”) lead trial counsel Nick Roxborough recently discovered that he would
7 be out of town on December 4, 2015 for business-related purposes for a meeting that
8 could not be rescheduled;

9 WHEREAS, Plaintiff Continental Casualty Company’s (“Plaintiff”) lead trial
10 counsel G. David Godwin is unavailable on December 11, 2015;

11 WHEREAS, the first date upon which both parties’ lead trial counsel will be
12 available is therefore December 18, 2015;

13 WHEREAS, the parties are already engaging in an informal exchange of
14 documents in preparation for a proposed early mediation date, and good cause exists
15 for the requested continuance of the CMC; and

16 WHEREAS, Defendant’s counsel checked Judge Illston’s online calendar and
17 did not find any conflict or unavailability for the Court on December 18, 2015.

18 NOW, THEREFORE, IT IS HEREBY STIPULATED that the CMC shall be
19 continued from December 4, 2015 to December 18, 2015 at 2:30 p.m.

20
21 DATED: October 19, 2015

22 RESPECTFULLY SUBMITTED,

23 ROXBOROUGH, POMERANCE, NYE & ADREANI, LLP

24
25 By: /s/ Burton E. Falk

NICHOLAS P. ROXBOROUGH

BURTON E. FALK

CHARLES R. RONDEAU

Attorneys for Defendant RECOLOGY, INC.,
f/k/a NORCAL WASTE SYSTEMS, INC.

CARROLL, BURDICK & McDONOUGH

By: /s/ Geoffrey David Godwin

GEOFFREY DAVID GODWIN

Attorneys for Plaintiff

CONTINENTAL CASUALTY COMPANY,
an Illinois corporation

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATE: 10/20/15

By: 
THE HONORABLE SUSAN ILLSTON